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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TAMARA SPEAKS,

Plaintiff,

vs.

EMPLOYERS HOLDINGS INC., DOES I
THROUGH X, INCLUSIVE, AND ROE,

Defendant.

Case No. 2:23-cv-0068-GMN-BNW

**STIPULATION TO PERMIT
PLAINTIFF ADDITIONAL TIME TO
RESPOND TO MOTION TO DISMISS**

[FIRST REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Plaintiff and Defendant Employers Holdings, Inc., by and through their respective counsel, hereby stipulate and agree to permit Plaintiff an additional 18-days, or until March 17, 2023, to file a response to Defendants' Motion to Dismiss (ECF No. 10). Per the Minute Order filed by the Court on February 13, 2023 (ECF No. 11), Plaintiff's response to the dispositive motion is due today. This is the parties' first request for an extension of time for the purpose set forth herein. The parties respectfully request the Court approve this stipulation. In support of this request, the parties rely upon the facts set forth below.

Good cause exists to support this request for a short extension of time. Counsel for Plaintiff, who was retained last week, entered his appearance today. Counsel for Plaintiff will need additional time to review the docket and all relevant documents before preparing and filing a response to the pending motion to dismiss. Additionally, counsel for Plaintiff will need additional time to meet and confer with his client regarding the arguments set forth in Defendant's dispositive motion before being able to respond to them. Accordingly, a short extension of time, until March 17, 2023, will permit undersigned counsel for Plaintiff sufficient time to accomplish the foregoing.

The parties respectfully request that the Court approve this Stipulation.

Respectfully submitted,

/s/ Joshua A. Sliker

/s/ Paul S. Padda

Joshua A. Sliker, Esq.
Katlyn M. Brady, Esq.
Counsel for Defendant Employers Holdings, Inc.

Paul S. Padda, Esq.
Counsel for Plaintiff

Dated: February 27, 2023

Dated: February 27, 2023

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: February 28, 2023